

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2004-1-E

IN THE MATTER OF:)	
)	
Carolina Power & Light Company)	
d/b/a Progress Energy Carolinas, Inc.)	INTERROGATORIES OF
Annual Review of Base Rates)	THE CONSUMER ADVOCATE
for Fuel Costs)	(Set No. 2)
_____)	

Pursuant to S.C. Code Ann. § 37-6-601 et. seq., (1989 and Supp. 2002), and 26 S.C. Code Ann. Regs. 103-851 (1976 and Supp. 2002), this party of record and Intervenor, Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina, hereby serves these Interrogatories upon Progress Energy Carolinas, Inc. (Company) in Docket No. 2004-1-E and files the original and one (1) copy with the Honorable Bruce F. Duke, Executive Director of the South Carolina Public Service Commission.

IT IS HEREIN REQUESTED:

- A. That all information requested below, unless otherwise specified, be limited to the Company's South Carolina operations.
- B. That all information shall be provided to the undersigned in the format as requested.
- C. That all responses to the requests below be labeled using the same numbers as used herein.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the interrogatory response in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.

- F. That all exhibits be reduced to 8½" x 11" format.
- G. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.
- I. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- J. That the Company provide the Consumer Advocate two copies of the responses to these Interrogatories as soon as possible, but no later than **March 12, 2004**.
- K. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
- L. These Interrogatories shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

Regarding the direct testimony of Company witness Barkley at page 4:

- 2-1. please provide all Surface Transportation Board (STB) decisions and orders regarding this matter.
- 2-2. Please provide details underlying the refund ordered by STB.
- 2-3. Please provide the old and new Norfolk Southern (NS) coal rates.
- 2-4. Do the forecasted fuel costs in this case include the old NS rail rates or the new ones found reasonable by the STB?
- 2-5. Based on forecast period sales in the current fuel filing, what is the difference in costs (total CP&L system and SC) using the old NS rates and the new rates?
- 2-6. When do (did) the new NS rates become effective?

- 2-7. Please provide details underlying any expected or possible refunds as discussed in Mr.Barkley's testimony.

Elliott F. Elam, Jr.
Acting Consumer Advocate

Hana Pokorna-Williamson
Staff Attorney

By: _____
S.C. Department of Consumer Affairs
3600 Forest Drive
Post Office Box 5757
Columbia, S.C. 29250-5757
(803) 734-4189

March 2, 2004

CERTIFICATE OF SERVICE

This is to certify that I, Elliott F. Elam, Jr., have served this day the foregoing **Interrogatories of the Consumer Advocate (Set No. 2)** upon the persons named below, at the addresses set forth, by deposit in the United States mail, postage prepaid.

Len S. Anthony, Esquire
Progress Energy Services Company
P.O. Box 1551 / PEB 17A4
Raleigh, NC 27602-1551

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

March 2, 2004
Columbia, South Carolina